

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ESTATE OF DEREK WILLIAMS JR.,
by SHARDAY ROSE, Special Administrator; and
TANIJAH WILLIAMS, DEREK WILLIAMS III, and
TALIYAH S. WILLIAMS, minors by their mother
and guardian SHARDAY ROSE,

Plaintiffs,

v.

Case No. 16-C-869

CITY OF MILWAUKEE, and Milwaukee Police
Officers JEFFREY CLINE, RICHARD TICCIONI,
PATRICK COE, JASON BLEICHWEHL,
ROBERT THIEL, TODD KAUL,
ZACHARY THOMS, GREGORY KUSPA,
CRAIG THIMM, CHAD BOYACK, and
DAVID LETTEER,

Defendants.

**AFFIDAVIT OF SUSAN E. LAPPEN IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

STATE OF WISCONSIN)
) ss:
MILWAUKEE COUNTY)

SUSAN E. LAPPEN, being first duly sworn upon oath, does depose and state as follows:

1. I have been assigned to represent the defendants in the above captioned matter, and I have personal knowledge of the information averred to herein.

2. Attached as Exhibit SL-1 is a true and correct copy of Wisconsin Administrative Code Section LES 3.03, regarding law enforcement training mandates.
3. Attached as Exhibit SL-2 is a true and correct copy of Wisconsin Statute Section 165.85, regarding the law enforcement standards board.
4. Attached as Exhibit SL-3 is a true and correct copy of the transcript of the proceedings regarding the inquest into the death of Derek Williams, Case No. 12-JD-000027, which occurred in the Milwaukee County Circuit Court on February 13, 2003. These excerpts include the sworn testimony of Sharday Rose, Mr. Williams' girlfriend and the mother of his children, and Tyrone Mathis, who is the step-father of Ms. Rose.
5. Attached as Exhibit SL-4 is a true and correct copy of the transcript generated from the April 13, 2017 deposition of Dr. Brian L. Peterson, who is the medical examiner for Milwaukee County.
6. Attached as Exhibit SL-5 is a true and correct copy of the transcript of the testimony provided by Dr. Peterson, in the context of the above-noted inquest.
7. Attached as Exhibit SL-6 is a true and correct copy of the transcript of the testimony provided by Dr. Harry Jacob, in the context of the above-noted inquest.
8. Attached as Exhibit SL-7 is a true and correct copy of excerpts from the transcript generated from the April 12, 2017 deposition of Sharday Rose in this case.
9. Attached as Exhibit SL-8 is a copy of Section 312-03.1 of the Milwaukee Code of Ordinances.

10. Attached as Exhibit SL-9 is a true and correct copy of the transcript of the testimony provided by Ricardo Fernandez in context of the above-noted inquest.

Dated at Milwaukee, Wisconsin this 24th day of April, 2017.

s/SUSAN E. LAPPEN
SUSAN E. LAPPEN

Subscribed and sworn to before me
this 24th day of April, 2017.

Cynthia Reynolds
State of Wisconsin, Notary Public
My Commission expires 1/24/2021

1032-2016-1482/238199